

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA  
CLARKSBURG DIVISION**

**STATE OF OHIO, et al.,**

**Plaintiffs,**

**v.**

**NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION**

**Defendant.**

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CASE NO: 1:23-cv-00100

Judge John Preston Bailey

**JOINT MOTION TO FURTHER EXTEND CERTAIN CASE DEADLINES**

Plaintiffs State of Ohio, Commonwealth of Virginia, District of Columbia, the States of Colorado, Illinois, Minnesota, Mississippi, New York, North Carolina, Tennessee, and West Virginia, and the United States of America (collectively “Plaintiffs”) and Defendant National Collegiate Athletic Association (“Defendant”), through counsel, respectfully move this Court for an Order amending certain deadlines set forth in the Court’s January 30, 2024 Scheduling Order (ECF No. 116), as amended by the Court’s Amended Case Scheduling Orders (ECF Nos. 130 and 132).

The parties efforts to resolve this matter are reaching culmination, and another extension of two impending scheduling deadlines is needed to afford the parties time to complete their negotiations. Specifically, the parties jointly request a brief extension of Defendant’s Answer deadline and Plaintiffs’ Joinder and Amendments deadline.

Pursuant to the Court’s Amended Case Scheduling Order (ECF No. 132), the deadlines are as follows:

Joinder and Amendments: March 29, 2024

Answer: April 3, 2024

The parties jointly request that these deadlines be extended as follows:

Joinder and Amendments: April 19, 2024

Answer: April 24, 2024, or within 14 days of service of a  
Second Amended Complaint, whichever is later

The parties are not seeking modification of any other deadlines set forth in the Court's January 30, 2024 Scheduling Order (ECF No. 116), which would remain unchanged.

A proposed entry setting forth the agreed dates for the amended case schedule is attached for the Court's consideration.

Dated: March 29, 2024

Respectfully submitted,

**On behalf of Plaintiff States:**

/s/ Douglas L. Davis

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Commonwealth of Virginia, District of Columbia,  
and States of Colorado, Illinois, Minnesota,  
Mississippi, New York, North Carolina, and  
Tennessee*

**On behalf of NCAA:**

/s/ Benjamin L. Bailey

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*Counsel for Defendant  
National Collegiate Athletic Association*

**On behalf of United States of America:**

/s/ Maximillian F. Nogay

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*Counsel for Plaintiff United States of America*

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**CERTIFICATE OF SERVICE**

I, Benjamin L. Bailey, do hereby certify that on 29<sup>th</sup> day of March 2024, I filed the foregoing document titled **JOINT MOTION TO FURTHER EXTEND CERTAIN CASE DEADLINES** using the Court's CM/ECF system which will send notification to all counsel of record.

/s/ Benjamin L. Bailey  
Benjamin L. Bailey (WVSB No. 200)